

---

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION**

---

IN RE:

SUSAN CLEAR DUNAWAY

Debtor.

)  
)  
)  
)  
)

Case No.: 3:21-bk-30226-SHB

CHAPTER 7

---

**AMENDED MOTION TO WITHDRAW REPRESENTATION**

---

**NOTICE OF HEARING**

**Notice is hereby given that:**

**A hearing will be held on the Motion to Withdraw Representation on August 19, 2021 at 9:00 a.m. in Courtroom I-C of the Howard Baker, Jr. United States Courthouse, 800 Market Street, Knoxville, TN 37902.**

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

**If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend this hearing, the court may decide that you do not oppose the relief sought in the Moton to Withdraw Representation and may enter an order granting that relief.**

Comes now Devin S. DeVore, attorney for Ramie Roberts, and requests to be relieved as her counsel of record and for good cause shown states as follows:

1. That Ramie Roberts has failed to substantially fulfill an obligation to Counsel regarding his services;
2. That Ramie Roberts has failed to abide by the Contract between her and Counsel;
3. That Counsel can no longer effectively represent Ramie Roberts;

4. Due to Ramie Roberts' failure to substantially fulfill an obligation to counsel, failed to abide by the Contract between her and Counsel, and because Counsel can no longer effectively represent her, it is no longer prudent for Ramie Roberts and Counsel to continue their professional relationship.

WHEREFORE, Counsel for Ramie Roberts prays:

1. That the Court approve the contemporaneously filed Order Withdrawing Representation;
2. That Counsel for Ramie Roberts be relieved as counsel in all matters that she is a party of before this Honorable Court.

RESPECTFULLY submitted this 2<sup>nd</sup> day of August, 2021.

/s/ Devin S. DeVore  
Devin S. DeVore, BPR #032069  
McKellar, Easter & DeVore  
317 Ebenezer Road  
Knoxville, Tennessee 37923  
(865) 566-0125  
(865) 566-0126 – facsimile  
dsd@helpingclients.com

**CERTIFICATE OF SERVICE**

The Undersigned hereby certifies that a true and exact copy of this Amended Motion to Withdraw Representation has been filed electronically this the 2<sup>nd</sup> day of August, 2021. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. Parties may access this filing through the Court's electronic filing system. A copy of this Notice is also being mailed first class, postage prepaid, or electronically mailed to the following parties:

Susan Clear Dunaway  
5109 Papermill Dr.  
Knoxville, TN 37909

M. Aaron Spencer  
Chapter 7 Trustee  
P. O. Box 900  
Knoxville, TN 37901  
[aspencer@wmbac.com](mailto:aspencer@wmbac.com)

Nicholas B. Foster  
Office of the U. S. Trustee  
Historic U. S. Courthouse  
31 East 11th Street  
Chattanooga, TN 37402  
[nick.foster@usdoj.gov](mailto:nick.foster@usdoj.gov)

Ramie Roberts  
P.O. Box 22462  
Knoxville, TN 37933  
[roberts.rai@icloud.com](mailto:roberts.rai@icloud.com)

This the 2<sup>nd</sup> day of August, 2021.

/s/ Devin S. DeVore  
Devin S. DeVore